REMARKS/ARGUMENTS:

Claim Rejections-35 U.S.C. §112.

Claims 1 through 16 have been amended to correct a number of antecedent basis problems as noted by the Examiner or discovered in further review of these claims. The Applicant wishes to thank the Examiner for bringing these claim errors to the Applicant's attention.

Claim Rejection-35 U.S.C. §103.

The rejection of claims 1 through 16 over Hugh in light of Marpe is respectfully traversed.

Generally, Hugh teaches an idea organization tool in some ways analogous to the present invention but differing by its goal of eliminating hierarchical modes of organization. As noted in Hugh, the Hugh device offers a "methodology for the navigation and management of essentially immeasurable information resources that transcends the limitations inherent in traditional hierarchical based approaches (emphasis added). It is clear in this context that Hugh intends to create a system that does not use or require any hierarchical framework.

As noted by the Examiner, per col. 28, lines 35-52, however, Hugh is willing to accept "semi-hierarchical arrangements" provided by separate software, for example, a standard file organization system in which non-hierarchical data is stored. Nevertheless, such a hierarchical file storage would not meet the limitations of claim 1 which requires displaying the text identified ideas on a graphics display according to the hierarchy.

Thus, Hugh fails to teach the elements (ii) and (iii) of claims 1 and 10.

Because Hugh clearly teaches away from a hierarchical system, a combination of Hugh with a hierarchical system such as Marpe is believed to be inappropriate. Nevertheless, even assuming that the combination of Hugh and Marpe were properly taught or suggested by the prior art, the combination would still fail to teach the elements of the present claims.

In particular with respect to claim 1, Hugh and Marpe, in combination, fail to show arranging text identified ideas in a hierarchical form according to user-entered numerical priorities as required by elements (iv) and (v) of claim 1. The priority numbers accepted by Hugh do not appear to directly affect the display arrangement of the ideas on the graphical

display as required by claim 1 element (v). The cited sections of col. 7 indicate that the user may establish a priority number, but the Applicant can find no support for the idea that these priority numbers affect the graphic arrangement of the text identified ideas, for example, a description of whether higher priority text identified ideas are placed higher on the screen or further to the left or further from the center. Also, Applicant's review of the text and Figs. 3 and 21 does not reveal any sort of correlation between idea location and priority number. Hugh avoids the problem of priority within a level by simply ignoring all hierarchical relationships between ideas in favor of a more generalized diagram.

With respect to dependent claim 2, Applicant believes that Fig. 16 of Hugh does not represent "text identified ideas" at least in the same sense that the Examiner has used the term with respect to claim 1, nor is it apparent that the structure of Fig. 16 is displayed on a graphics display being instead apparently a logical structure of a data file not intended for display at all.

With respect to dependent claim 3, Applicant accepts that Hugh teaches a tree structure but finds no support for the idea that the nodes are arranged according to priority of ideas on which they are related. To the contrary, the section cited by the Examiner notes that the interrelation between nodes "should not be construed as restricting the flexibility of the described information storage structure" which teaches away from hierarchical dependencies and levels.

With respect to claims 4-6, Hugh is silent as to how priority numbers are set stating explicitly only that they can be calculated based upon usage statistics. It is believed that Hugh is not enabling as to any teachings of changing priorities by graphical manipulation as claimed in claim 4.

With respect to claims 7, 8, and 9, Applicant can find no teaching in Hugh of a slide control for inputting priority values to items in a list, nor any depiction of this in the Hugh figures. Further, Hugh appears to provide no teaching of coordinating the slides of different values in the list so that their numeric values remain monotonic as required of these claims.

With respect to claim 10, Applicant can find no teaching in Hugh or Marpe of a system for prompting the user based on entry of an idea in a given level for additional text for a next level. This sort of guidance of the user's thinking process and development of ideas appears to be wholly absent in the Hugh application. Accordingly, Applicant can also not

find any reference to presenting the user with open-ended questions or in categorizing ideas as issues, positions, and arguments of augmenting the questions with text from entered ideas or in presenting the user with other prompts to encourage development of a hierarchical structure in Hugh according to claims 11-14.

With respect to claims 15 and 16, the Applicant concurs that these limitations parallel those of claims 2 and 3 and should be allowable for similar reasons.

In light of these comments and amendments, it is believed and claims 1-16 are now in condition for allowance and allowance is respectfully requested.

Respectfully submitted,

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